

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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UNITED STATES OF AMERICA)

v.)

No. 1:14-cr-83

KASSIM MARSH,)

a/k/a "Wavy," a/k/a "Tommi,")

KALIF BANKS,)

a/k/a "Gutta,")

ALIQUAN UMSTEAD,)

a/k/a "Rico, a/k/a "Smoke,")

JAHLIL MARSH,)

a/k/a "Skillz," a/k/a "SK,")

MARQUESE JONES,)

a/k/a "YP,")

MOSES GEYER,)

a/k/a "Space,")

TYRONE CROMER,)

a/k/a "Loose," a/k/a "Mush,")

KESHEAN NETTLES,)

a/k/a "Carl,")

ADAM BROWN, and)

RICHARD DENISON,)

Defendants.)

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT 1

From in or about fall 2012 to in or about fall 2014, in the District of Vermont and elsewhere, defendants KASSIM MARSH, a/k/a "Wavy," a/k/a "Tommi," KALIF BANKS, a/k/a "Gutta," ALIQUAN UMSTEAD, a/k/a "Rico, a/k/a "Smoke," JAHLIL MARSH, a/k/a "Skillz," a/k/a "SK," MARQUESE JONES, a/k/a "YP," MOSES GEYER, a/k/a "Space," TYRONE CROMER, a/k/a "Loose," a/k/a "Mush," KESHEAN NETTLES, a/k/a "Carl," ADAM BROWN, and RICHARD DENISON knowingly and willfully conspired together, and with Matthew

Wilbert and others known and unknown to the Grand Jury, to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

The conduct of defendants KASSIM MARSH, a/k/a "Wavy," a/k/a "Tommi," KALIF BANKS, a/k/a "Gutta," ALIQUAN UMSTEAD, a/k/a "Rico, a/k/a "Smoke," and JAHLIL MARSH, a/k/a "Skillz," a/k/a "SK," as members of the conspiracy, which includes the reasonably foreseeable conduct of co-conspirators, involved one hundred grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B))

COUNT 2

On or about April 9, 2013, in the District of Vermont, defendant MOSES GEYER, a/k/a “Space,” knowingly and intentionally distributed heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 3

On or about May 29, 2013, in the District of Vermont, defendant JAHLIL MARSH, a/k/a “Skillz,” a/k/a “SK,” knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 4

On or about May 31, 2013, in the District of Vermont, defendants MOSES GEYER, a/k/a “Space,” and JAHLIL MARSH, a/k/a “Skillz,” a/k/a “SK,” knowingly and intentionally distributed heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C); 18 U.S.C. § 2)

COUNT 5

On or about June 26, 2013, in the District of Vermont, defendant KESHEAN NETTLES, a/k/a "Carl," knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 6

On or about July 3, 2013, in the District of Vermont, defendant KESHEAN NETTLES, a/k/a "Carl," knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 7

On or about July 16, 2013, in the District of Vermont, defendant KASSIM MARSH, a/k/a “Wavy,” a/k/a “Tommi”, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 8

On or about September 6, 2013, in the District of Vermont, defendant TYRONE CROMER, a/k/a "Loose," a/k/a "Mush," knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 9

On or about September 10, 2013, in the District of Vermont, defendant TYRONE CROMER, a/k/a "Loose," a/k/a "Mush," knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 10

On or about October 16, 2013, in the District of Vermont, defendants JAHLIL MARSH, a/k/a "Skillz," a/k/a "SK," and RICHARD DENISON knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C); 18 U.S.C. § 2)

COUNT 11

On or about November 14, 2013, in the District of Vermont, defendant ADAM BROWN knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 12

On or about November 18, 2013, in the District of Vermont, defendant ADAM BROWN knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 13

On or about December 11, 2013, in the District of Vermont, defendant ALIQUAN UMSTEAD, a/k/a "Rico, a/k/a "Smoke," knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 14

On or about January 8, 2014, in the District of Vermont, defendant ALIQUAN UMSTEAD, a/k/a "Rico, a/k/a "Smoke," knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 15

On or about April 16, 2014, in the District of Vermont, defendant ALIQUAN UMSTEAD, a/k/a “Rico, a/k/a “Smoke,” knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 16

On or about April 16, 2014, in the District of Vermont, defendant MARQUESE JONES, a/k/a "YP," knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT 17

On or about September 16, 2014, in the District of Vermont, defendant KASSIM MARSH, a/k/a "Wavy," a/k/a "Tommi", knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

Forfeiture Notice - No. 18

1. The allegations contained in Count 1 of this Second Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 846 and 841(a)(1), defendants KASSIM MARSH, a/k/a "Wavy," a/k/a "Tommi," KALIF BANKS, a/k/a "Gutta," ALIQUAN UMSTEAD, a/k/a "Rico, a/k/a "Smoke," JAHLIL MARSH, a/k/a "Skillz," a/k/a "SK," MARQUESE JONES, a/k/a "YP," MOSES GEYER, a/k/a "Space," TYRONE CROMER, a/k/a "Loose," a/k/a "Mush," KESHEAN NETTLES, a/k/a "Carl," ADAM BROWN, and RICHARD DENISON shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

3. If any forfeitable property described above, as a result of any act or omission of the defendants:


- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C.
§ 853(p).

(21 U.S.C. § 853)

A TRUE BILL





TRISTRAM J. COFFIN (CSN)
United States Attorney
Rutland, Vermont
November 19, 2014